NPDES Permit Tracking No.:
MAR05CV20

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: Rodney Hunt Company

2. NPDES Permit Tracking No.: MAR05CV20

3. Facility Physical Address:

a. Street: 46 Mill Street

b. City: Orange c. State: MA d. Zip Code: 01364-

4. Lead Inspectors Name: Doug Stellato Title: Comp. Specialist

Additional Inspectors Name(s): Michelle Thibodeau Comp. Specialist

5. Contact Person: Ryan Pasholk Title: EH&S Engineer

Phone: 978 - 544 - 2511 Ext. 228 E-mail: ryan.pasholk@rodneyhunt.com

6. Inspection Date: 09 / 23 / 2013

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☑ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☑ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

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3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☑ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☑ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

A review of all stormwater monitoring data was performed to identify potential pollutant hot spots. During the evaluation it was determined that Q2 stormwater sampling monitoring and Q2 and Q3 visual quarterly inspections had been performed. There have been recent management changes and moving forward all inspections will be conducted on a regular basis.

A review of the data indicates that Outfall 1 exceeded the benchmark limits for Nitrates. Outfall 3 exceeded the benchmark limits for Al and Fe. Going forward, as a preventative correct measure, Rodney Hunt personnel will insepct all outdoor areas to ensure they remain free of potential pollutant sources, including but not limited to, metal shavings, dust, etc. In the event that debris is encountered it will be swept up immediately to ensure it does not impact the quality of stormwater runoff.

Additionally, Rodney Hunt intends to pump out all catch basins on-site on a periodic basis. During the evaluation it was determined that Q2 and Q3 visual quarterly inspections have been performed.

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

All catch basins, outfalls, and potential pollutant sources were inspected.

All stormwater outfalls were found to be in good overall condition. In general, the outfalls discharge either directly into the river or to rip-rap leading into the Millers River to prevent scouring.

Catch basins were clean and clear of any debris. No evidence of pollutants entering the drainage system were observed during the site inspection. All outfalls were inspected and found to be in good condition structurally and clear of any sold waste, trash, or sediment. Rodney Hunt will continue to maintain good housekeeping BMPs including sweeping at regular intervals.

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☐ YES ☑ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? ☐☐

NOTE: *Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA 01:

1. Brief Description**:**

Sand Blasting and Metal Surface cleaning - All sand blasting operations occur indoors in a building equipped with a dust collection system to reduce the likelihood of dust and sand particles exiting the building. The system appeared to be operating correctly at the time of the stormwater inspection.

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☑ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA 02:

1. Brief Description:

Painting Operations - These operation occur indoors and there was no evidence of pollutants entering the drainage system from this area.

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☑ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA 03:

Brief Description:

Spills and Drips - There was a small spot of oil on the pavement by the maintenance area. Facility personnel immediately cleaned it up and there was no evidence of pollutants entering into the drainage system. According to facility personnel, all spills and drips are cleaned up immediately.

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☑ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

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NOTE: *Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA 04:

1. Brief Description:

Metal Preparation including grinding, welding, sawing, shaving, brazing, bending, cutting, and etching - All of the above described operations continue to occur indoors.

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☑ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA 05:

1. Brief Description:

Surface Treatment including finishing, chemical coating, polishing, and abrasive cleaning - All surface treatment operations occur indoors to minimize the likelihood of contact with stormwater.

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☑ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA 06:

1. Brief Description:

Heavy Equipment Use and Storage - Preventative maintenance is performed regularly (indoors) on all heavy equipment to prevent leaking fluids.

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☑ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

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D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 01 of 01 for this reporting period.

2. Is this corrective action:

- ☑ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☑ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Rodney Hunt exceeded the benchmark limits for Nitrates for Outfall 1 and the benchmark limits for Al and Fe for Outfall 3.

5. Date problem identified: 09 / 23 / 2013

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☑ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

Personnel continues to inspect all outdoor areas to ensure they remain free of debris. In the event that debris is encountered, it will be immediately cleaned up. Rodney Hunt will also perform maintenance on their stormwater conveyance system (pump out catch basins) on a regular basis.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☑ NO

9. Date corrective action initiated: 09 / 23 / 2013

10. Date correction action completed: ___ / ___ / ____ or expected to be completed: 12 / 31 / 2013

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

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E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

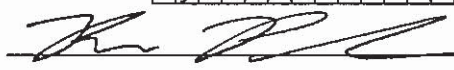
Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☑ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: Ryan Pashoik Title: EHS Engineer

Signature:  Date Signed: 11/5/2013